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Robert Swale
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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

August 30, 1991

VIA CERTIFIED MAIL - P404-637-280

Mr. John J. Murphy
American Chemical Service, Inc.
P.O. Box 190
Griffith, Indiana 46319

Re: Closure Plan
Notice of Deficiency
Technical Review
American Chemical Services, Inc.
Griffith, Indiana
IND 016360256

Dear Mr. Murphy:

The Indiana Department of Environmental Management (IDEM) has received the closure plan for American Chemical Services, Inc., dated October 8, 1990. The closure plan has been reviewed for technical adequacy and determined to be inadequate pursuant to 329 IAC 3.

The enclosed Notice of Deficiency (NOD) outlines the specific deficiencies and provides discussion relevant to the revision. The information requested by the NOD must be submitted, in full, as an amended closure plan. This is required before the closure plan may be considered technically adequate.

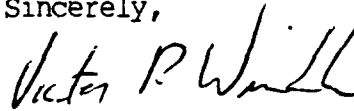
The completed closure plan must be received by this office within thirty (30) days of receipt of this notice. Each page of your submission must be uniquely numbered and must have the date of the submission.

Please submit four (4) copies of the amended closure plan to the IDEM to the address above. A certification statement identical to the one stated in 329 IAC 3-34-2 must accompany all submissions.

Mr. John J. Murphy
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If you have any questions regarding this matter, please contact Mr. Mitch Mosier, at AC 317/232-4534.

Sincerely,

A handwritten signature in black ink, appearing to read "Victor P. Windle". The signature is fluid and cursive, with the first name "Victor" and last name "Windle" clearly distinguishable.

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

MJM/go
Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Mr. Robert Swale, U.S. EPA, Region V

Notice of Deficiency
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General Comments

- 1) Include a certification statement for the closure plan.

Technical Comments

- 1) Tanks and Vessels, Page 12. All tanks and vessels will require high pressure steam cleaning and triple rinsing after the solid residues have been manually scraped and/or brushed from the interior surfaces. Samples of the final rinsate must be analyzed for Volatile Organic Compounds (VOCs) and EP-tox metals (totals). Modify as necessary.
- 2) Tank and Vessel Closure Criteria, Page 12. Visual inspection is inadequate for RCRA clean closures. Minimum proposal expectations of the IDEM concerning clean closure criteria for tanks and vessels are as follows:

Samples will be considered clean when;

A. Concentrations of all VOCs are at or below detection limits.

B. Concentrations of EP-tox metals (totals) are at or below the primary drinking water standards.
- 3) Tanks and Vessel Closure Criteria, Page 12. An HNU may be used to determine the level of protection required for personal protection, however, clean closure will require rinsate analyses, see comments numbered 1 and 2. Modify as necessary.
- 4) Container Storage Area and Concrete Surfaces, Page 13. Sandblasting is not a recommended method of decontamination. The storage areas and concrete surfaces undergoing closure will require a high pressure steam cleaning followed by triple rinsing after scraping and/or brushing of the surfaces until they are visibly clean and free of hazardous waste and/or hazardous waste residue. Samples of the final rinsate will be analyzed for VOC's and EP-tox metals (totals). Modify as necessary.
- 5) Container Storage Area Closure Criteria, Page 14. Visual inspection is not adequate for RCRA clean closures. The minimum proposal expectations of the IDEM concerning clean closure criteria of storage areas and concrete surfaces are as follows:

Samples will be considered clean when;

- A. Concentrations of VOCs are at or below detection limits.
 - B. Concentrations of EP-tox metals (totals) are at or below the primary drinking water standards. Modify as necessary.
- 6) Pipes, Pumps, Filters, etc., Page 14. After purging all liquids and loose solid materials from the lines using compressed nitrogen, the piping, pumps, filters, etc. which will not be disposed of as hazardous waste should be decontaminated by high pressure wash followed by triple rinsing. Rinsate generated during this process must be disposed of as hazardous waste unless analytical data is provided to insure that the rinsate is not hazardous. Modify as necessary.
 - 7) Appurtenant Equipment Closure Criteria, Page 15. This section will require modification in light of the previous comments. Modify as necessary.
 - 8) Subsurface Soils and Groundwaters, Page 15. A sampling and analysis plan (SAP) will be required for soils present underneath and around the units undergoing closure. Soil characterization data generated by the SAP will provide important information for the CERCLA team investigating this site.
 - 9) The closure performance standard must be included in ACS's revised closure plan.
 - 10) A quality assurance project plan (QAPP) must be provided for this project. Please refer to Chapter 1 of the EPA publication, "Test Methods for Evaluating Solid Waste Physical/Chemical Methods," SW-846, which will define the 16 essential elements of a QAPP. The laboratory retained to perform the analytical determinations may be able to provide a QAPP for this project.
 - 11) Update the closure cost estimate with these revisions.

MJM/go